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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a
municipal entity, JIM McDONNELL,
LAPD CHIEF, sued in his official
capacity;

DEFENDANTS.

Paul Hoffman, SBN 71244
Michael Seplow, SBN 150183
John Washington, SBN 315991
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Case No. 25-cv-05423 HDV-E

**NOTICE OF EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
ORDER TO SHOW CAUSE RE
PRELIMINARY INJUNCTION**

Date: TBD

Time: TBD

Ctrm: 5B Hon. Hernan D. Vera

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that for the reasons fully explained in the accompanying Memorandum of Points and Authorities, Plaintiffs hereby make this ex parte application for a temporary restraining order and order to show cause why a preliminary injunction should not issue; or, in the alternative, for an order to show cause on a shortened briefing schedule. This application is based on Fed. Rule of Civ. Proc. 65, Local Rule 65-1, and the First, Fourth, and Fourteenth Amendments to the United States Constitution, sections 409.7 and 13652 of California Penal Code and section 52.1 of the California Civil Code. Plaintiffs support this application with the accompanying memorandum of law, declarations and exhibits submitted in support thereof.

As further described in the complaint, memorandum and proposed order submitted with this application, Plaintiffs hereby seek an emergency order directing Defendants City of Los Angeles and Los Angeles Police Department Chief Jim McDonnell (collectively “LAPD”) to comply with California Penal Code sections 409.7 and 13652, including by not dispersing, citing, arresting, or assaulting journalists present at any demonstration, march, protest, or assembly involving activity protected by the First Amendment to the United States Constitution and/or Article I of the California Constitution, not using less-lethal munitions or other force against journalists who pose no imminent threat of serious harm, and clarifying the indicia the LAPD use to identify journalists, as well as requiring the LAPD to distribute the temporary restraining order to all sworn personnel.

Plaintiffs further seek an order to show cause why the Court should not enter a preliminary injunction requiring the LAPD to re-issue their policies every six months, institute revised training consistent with the Court’s order, designate a Journalists’ Compliance Liaison to oversee compliance with the preliminary injunction and an Acting Journalists’ Compliance Liaison at any protest or other First Amendment activity to which LAPD deploys to oversee compliance with this Order.

Emergency relief is necessary because complying with regular noticed motion and hearing before the Court will result in prolonged loss of plaintiffs’ First Amendment

1 freedoms. Plaintiffs assert that they have an extraordinarily strong claim that the LAPD
2 has a custom and practice of violating the rights of journalists at protest, including by the
3 unlawful use of force causing serious physical injuries.

4 **Compliance with Local Rule 7-19**

5 Compliance with the requirements of Local Rule 7-19.1 and this Court's procedures
6 is set forth in the Declaration of Carol A. Sobel re Ex Parte Notice, submitted with this
7 application. Plaintiffs have provided notice of this Ex Parte Application to the Defendant
8 City. Telephonic notice was given to Denise Mills, Chief Deputy City Attorney, at
9 approximately 2:20 p.m. this date. On the advisement of Ms. Mills that the matter has
10 been assigned to Deputy City Attorney Christian Bojorquez, written notice was provided
11 to both as set forth in the attached letter.

12 **Defendants' Position.** Defendants have not advised if they will oppose.

13 Pursuant to Local Rule 7-19, the name, address, telephone number and e-mail
14 address of counsel for the opposing party is:

15 Christian Bojorquez
16 Deputy City Attorney
17 City Hall East, 200 N. Main Street, 8th Floor
18 Los Angeles, CA 90012
19 Email: Christian.bojorquez@lacity.org
20 Tel: (213) 978-8100 / (213) 978-7021

21 Dated: July 3, 2025

Respectfully submitted,

22 LAW OFFICE OF CAROL A. SOBEL
23 FIRST AMENDMENT COALITION
24 LAW OFFICE OF PETER BIBRING
25 SCHONBRUN, SEPLOW, HARRIS,
26 HOFFMAN & ZELDES LLP
27 LAW OFFICE OF SUSAN SEAGER

28 By: /s/ Carol A. Sobel

Attorney

Attorneys for Plaintiffs

DECLARATION OF CAROL A. SOBEL RE NOTICE

I, CAROL A. SOBEL, declare as follows:

1. I am an attorney admitted to practice before this Court. I have personal knowledge of the fact set forth below and, if called to testify to them, could and would do so competently.

2. On July 3, 2025 at approximately 2:15 p.m. I telephoned Chief Deputy City Attorney Denise Mills at her office telephone number. The message on her phone referred me to another number for her. I telephoned that number and spoke with Ms. Mills at approximately 2:20 p.m.

3. When I advised Ms. Mills that we would be moving for Ex Parte relief in this action, Ms. Mills advised that the case was assigned to Deputy City Attorney Christian Bojorquez. I then sent the attached letter by email to both Chief Deputy Mills and Deputy City Attorney Bojorquez, along with copies of the complaint previously served in this matter, the Memorandum of Point and Authorities, the Proposed Order and this Ex Parte Application. I advised that I would provide all Declarations and Exhibits in a separate email.

4. Because this is a holiday weekend, Plaintiffs believe the time for Defendants to respond should run from Monday, July 7.

5. I declare under penalty of perjury that the foregoing is true and correct.
Executed this 3rd day of July, 2025 in Los Angeles, California.


CAROL A. SOBEL

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